

Finally, Plaintiff has no issue with Doe's request to protect its identity. In that regard, Plaintiff is willing to enter into a reasonable protective order to maintain the confidentiality of the Doe's identity and contact information.

For the reasons set forth herein, Plaintiff requests the Doe Defendant's Motion to Quash and to Proceed Anonymously be denied. However, Plaintiff is willing to enter into a reasonable protective order to maintain as private Doe's identity and contact details.

Dated this 22nd day of September, 2017

Respectfully submitted,

Venice PI, LLC

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 22nd day of September, 2017, she electronically filed the foregoing "PLAINTIFF'S RESPONSE TO DEFENDANT

DOE'S MOTION TO QUASH SUBPOENA AND TO PROCEED ANONYMOUSLY " with the Clerk of the Court using the CM/ECF system which will electronically send notification of such filing to all counsel of record or interested parties via the CM/ECF system.

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